

# **EXHIBIT 118**

## **REDACTED**



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2 IN RE:

3 GOOGLE ANTITRUST LITIGATION

4 60-516110-0004

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10 \*\* HIGHLY CONFIDENTIAL \*\*

11 REMOTELY CONDUCTED

12 DEPOSITION OF [REDACTED]

13 Vancouver, Canada (Witness's location)

14 Tuesday, November 10, 2020

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20 Stenographically reported by:  
21 LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC  
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23 Washington CSR No. 3318  
24 Oregon CSR No. 19-0458  
25 Texas CSR No. 11318

Job No.: 2020-93264

A P P E A R A N C E S

(All appearances remotely via Zoom)

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U.S. DEPARTMENT OF JUSTICE  
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Also present:

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Alexandra Logan  
Jose Reyes, Lexitas Monitor Tech

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1 MR. WOLIN: Sure.

2 MR. HARKRIDER: Okay. Can we have a count?

3 I have I think -- off the record.

4 (Recess taken, from 3:47 to 4:02.)

5 BY MR. WOLIN:

6 Q. [REDACTED] I want to turn to discussing  
7 video advertisements. That was something that you  
8 focused on earlier in your tenure at Google; is that  
9 right?

10 A. That's correct.

11 Q. You were a product manager for video  
12 advertisements?

13 A. Not exactly. I was [REDACTED]  
[REDACTED].

15 Q. What were those features?

16 A. Those features included the ability to  
17 upload video files, video creatives, set them up in  
18 the product.

19 They included things like better reporting  
20 that accounted for all the different metrics that  
21 matter when you run a video campaign versus other  
22 types of campaigns. It involved allowing the  
23 publisher to set up their inventory to account for  
24 video and nonvideo inventory.

25 Q. In that work, you became familiar with some

1 of the differences between video ads and display  
2 ads; is that right?

3 **A. That's correct.**

4 Q. So video ads have motion; correct?

5 **A. Video ads generally have motion, but not**  
6 **always.**

7 Q. They generally have sound?

8 **A. They generally have sound.**

9 Q. Display ads, generally, is a static image;  
10 is that right?

11 **A. So display ads can be -- can also have**  
12 **videos embedded in them. In fact, many display ads**  
13 **are so-called rich media ads that also have videos**  
14 **in them that also have very similar characteristics**  
15 **to video ads.**

16 **The difference here is less about the ad**  
17 **itself, which could -- in both cases have motion or**  
18 **not have motion, or have sound or not have sound,**  
19 **but actually where the ad is placed.**

20 **So generally speaking, if the ad is placed**  
21 **in a video stream, that is referred to as an instream**  
22 **ad. If it's placed on a page with text and other**  
23 **content, that's generally referred to as a display**  
24 **ad.**

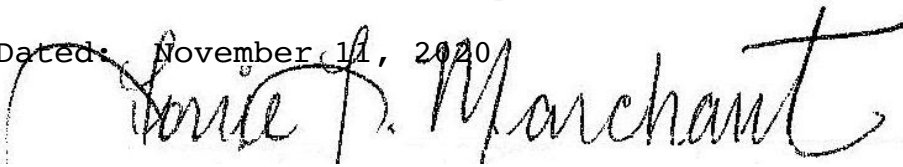
25 Q. Are there any other differences between

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF SONOMA )

I do hereby certify that the foregoing proceedings were reported by me to the best of my ability and thereafter transcribed into typewriting under my direction.

I further certify that I am not of counsel nor attorney for either or any of the parties hereto, nor in any way interested in the outcome of the cause named in the caption.

Dated: November 11, 2020



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